

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**UNITED STATES OF AMERICA** :

Plaintiff, :

: **1:19-CR-00809-WHP**

- v. - :

**ANTHONY COLLIER** :

Defendant :

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Motion in Support of Pretrial Release in efforts to limit the spread of COVID-19

Defendant, Anthony Collier respectfully requests release pursuant to 18 U.S.C. § 3142.

1. Mr. Collier is currently housed at the Metropolitan Detention Center and is scheduled to appear before Your Honor on April 7<sup>th</sup>, 2020.
2. Mr. Collier is a 55-year-old man who suffers from Asthma, high blood pressure and as recent as last year suffered from an upper respiratory infection. Due to Mr. Collier's medical background he is someone deemed "High Risk" and vulnerable to COVID-19, based on the CDC's criteria.
3. Mr. Collier does not present a risk of violence to members of the community nor a flight risk.
4. Mr. Collier respectfully requests release pursuant to 18 U.S.C. § 3142 under the following bail conditions

- a. \$50,000 bond signed by Mr. Collier's wife, Toni Collier
  - b. Pretrial supervision as directed
  - c. Travel restricted to SDNY/EDNY/ Southern District of Florida and points in between for travel for court appearances
  - d. Surrender all travel documents
  - e. Home incarceration
  - f. No access to the PII of others, no new bank accounts without the permission of pretrial services, and no access to online financial information
5. Assistant United States Attorney Andrew Rohrbach have no objection to The Court granting this motion.

WHEREFORE, Defendant respectfully requests Your Honor enter an Order granting this motion and release Mr. Collier subject to the conditions listed above.

cc: AUSA Andrew Rohrbach (ECF)  
AUSA Jonathan Rebold (ECF)

*Lance Clarke*

Lance A. Clarke, Esq.  
Bernstein Clarke & Moskowitz, PLLC  
11 Park Place, Suite 914  
New York, New York 10007  
Tel. (212) 321-0087